

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF OKLAHOMA**

**SHATTUCK BANCSHARES, INC.,
AND SNB BANK, N.A.**

Plaintiffs,

v.

Case No. 5:24-cv-00677-J

**ERIC HANNELIUS, MICHAEL
SHVARTSMAN, OKSANA MOORE,
KARLA KNIGHT, ELENA POPOVA,
JUSTIN SOULEN, BILL MY BNK,
LLC, BT ASSETS GROUP, INC., EFT
BUSINESS SERVICES, LLC,
ENCOMPAY, INC., HANNELIUS-
KNIGHT FAMILY TRUST, MG
FAMILY TRUST, ONE PAY CLOUD,
LLC, OST, LLC, PEPPER PAY, LLC,
ROCKET HOLDINGS, LLC, SALT
MONEY, INC., SKYLIGHT BUSINESS
SERVICES, LLC, TRANSACT FIRST,
INC., AND TRANSACTION
PROCESSING SERVICES, INC.,**

Defendants.

DECLARATION OF JUSTIN W. SOULEN

I, Justin W. Soulen, of lawful age and sound mind do swear, under penalty of perjury pursuant to the laws of the state of Florida, to the following:

1. I have personal knowledge of the facts set forth herein.
2. I am a Defendant in the above-captioned matter.
3. I have reviewed the Affidavit of Service from process server Roy Miller attached hereto as Exhibit A.
4. Mr. Miller makes several false statements in his Affidavit.

5. First, Mr. Miller claims that he personally served me with a copy of the Petition on June 15, 2024 at 10:39 a.m. This is patently false.

6. I was travelling in Europe with my wife on June 15, 2024.

7. Attached as Exhibit B are the flight confirmations, including that I actually flew on those flights, which show that I was in Europe on June 15, 2024.

8. My father, Michael Soulen and my mother were at my house on June 15, 2024 taking care of my two minor children while I vacationed with my wife in Europe.

9. I have discussed the events of June 15, 2024 with my father and he told me that he informed Mr. Miller that I was not present at the residence.

10. Also, contrary to Mr. Miller's affidavit, my father's name is not Justin Soulen and he did not identify himself to Mr. Miller as being Justin Soulen.

11. Neither my father nor mother live with me at that address.

12. Additionally, I do not believe Oklahoma has personal jurisdiction over me.

13. I have never done business in Oklahoma. I have never even been in Oklahoma.

14. To the extent I had any communications with Plaintiff SNB Bank, I was in Miami Florida at the time of any such communications and those communications were made in my capacity as an employee of Pepper Pay.

I declare under penalty of perjury the foregoing is true and correct.

Executed this 10th day of July, 2024.

Justin Soulen

EXHIBIT A

IN THE DISTRICT COURT OF ELLIS COUNTY, STATE OF OKLAHOMA

SHATTUCK BANCSHARES, INC., and SNB BANK, N.A.

Plaintiff(s) / Petitioner(s)

v.

**ERIC HANNELIUS, MICHAEL SHVARTSMAN, OKSANA
MOORE, KARLA KNIGHT, ELENA POPOVA, JUSTIN
SOULEN, BILL MY BNK, LLC, BT ASSETS GROUP, INC.,
EFT BUSINESS SERVICES, LLC, ENCOMPAY, INC.,
HANNELIUS-KNIGHT FAMILY TRUST, MG FAMILY
TRUST, ONE PAY CLOUD, LLC, OST, LLC, PEPPER PAY,
LLC, ROCKET HOLDINGS, LLC, SALT MONEY, INC.,
SKYLIGHT BUSINESS SERVICES, LLC, TRANSACT
FIRST, INC., and TRANSACTION PROCESSING
SERVICES, INC**

Case No.: CJ-2024-9

Defendant(s) / Respondent(s)

AFFIDAVIT OF SERVICE

I, Roy Miller, state:

I am 18 years or older and not a party to this action or a member of a corporation or organization that is a party to this action.

I served the following documents to Justin Soulen in Miami-Dade County, FL on June 15, 2024 at 10:39 am at 3936 NE 168th St., North Miami Beach, FL 33160 by personal service by handing the following documents to an individual identified as Justin Soulen.

Petition
Summons
Exhibits

Additional Description:

I confirmed that the person living at the address was the servee. I asked for them personally stating full name.

White Male, est. age 55-64, glasses: Y, Gray hair, 180 lbs to 200 lbs, 6' to 6' 3".
Geolocation of Serve: <https://google.com/maps?q=25.934743736,-80.1322979846>

Photograph: See Exhibit 1

Total Cost: \$156.70

I state under penalty of perjury under the laws of Oklahoma that the foregoing is true and correct.

Executed in

Miami-Dade County,

FL on 6/18/2024.

/s/ Roy Miller

Signature

Roy Miller

+1 (786) 327-4973



EXHIBIT B

**Lufthansa**

Changes to your booking

Passenger information

SOULEN/JUSTIN

Ticket numbers: 2202206601329 , 2202202368054

Dear Passenger,

as you are affected by a flight irregularity we have made the following changes to your itinerary:

Your itinerary

Fri. 07 June 2024: Miami – Frankfurt

Important Notice

Due to stricter security checks for flights from the US it is advisable to be at the airport about 2 hours prior to departure.

16:40 h Miami Miami Intl (MIA)**LH 463****07:50 h +1** Frankfurt Frankfurt (FRA)
Terminal 1operated by:
Lufthansa**Status:** confirmed, new time**Class:** Business Class (C)

Sat. 08 June 2024: Frankfurt – Nice

11:50 h Frankfurt Frankfurt (FRA)
Terminal 1**LH 1060****13:20 h** Nice Nice (NCE)
Terminal 1operated by:
Lufthansa**Status:** confirmed, new time**Seat:** 06C*, 02C***Class:** Business Class (C)

*Seat reservations are not binding and may change due to an unscheduled change of aircraft.

Important information

**Lufthansa**

- You can obtain your new boarding pass via the following check-in possibilities: online via the LH app or lufthansa.com, at a check-in machine or counter at the airport. If you were rebooked to another airline, please proceed to that airline's check-in facilities at the airport.
- We have tried to offer the best alternative connection to you. Should you not be able to use this alternative, please check whether you can rebook to another connection via the LH App or lufthansa.com.
- If this is not possible for your booked itinerary, our Service Center will be available at the following number to assist you in finding further possibilities:

+49 – (0)69 – 86 799 100 (Service in German and English language)

- Should you no longer wish to start your journey due to this irregularity please use the following possibilities for cancellation and refund:
 - For tickets purchased directly with Lufthansa please use lufthansa.com or the LH App and choose the button Refund.
 - For all other cases please contact the agency or airline from whom you purchased the ticket.
- All information regarding your passenger rights according to regulation (EC) no. 261/2004 may be found here.

We would like to apologize for this inconvenience.

Best regards

Your Lufthansa team

Lufthansa German Airlines is not liable for any changes of the transmitted data undertaken by you or a third party. No liability can be accepted for the accuracy of the information included in this document.

Please note that all flight times are local times.

created: 07 June 2024

Corporate Headquarters:
Deutsche Lufthansa
Aktiengesellschaft, Köln

Chairman of the Supervisory Board:
Dr. Karl-Ludwig Kley

Registration:
Amtsgericht Köln HRB 2168

Executive Board:
Carsten Spohr (Vorsitzender / Chairman),
Christina Foerster,
Harry Hohmeister,
Dr. Detlef Kayser,
Dr. Michael Niggemann

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A STAR ALLIANCE MEMBER 

Date of Purchase: Feb 29, 2024

Paris-De Gaulle, France ► Miami, FL

Passenger Information

JUSTIN SOULEN

Confirmation Number: GXK5OM

Ticket Number: 0068090769957

0068090769958

Flight

DATE AND FLIGHT

CDG ► MIA | Sun 16Jun2024 | AF 8348 |

STATUS

FLWN

CLASS

D

SEAT/CABIN